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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

JUL 20 1993

In the matter of

Preparation for International  
Telecommunication Union  
World Radiocommunication  
Conferences

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)ET Docket No. 93-198FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**COMMENTS OF AERONAUTICAL RADIO, INC.****INTRODUCTION**

Aeronautical Radio, Inc. (ARINC), hereby responds to the Commission's Notice of Inquiry into the issues that are likely to be raised at the upcoming World Radiocommunication Conference (November 15 - 19, 1993, Geneva).

ARINC is the communications company of the air transport industry, formed by aviation in 1929 at the suggestion of the Federal Radio Commission. It represents aviation in communications regulatory matters, both domestically and internationally. ARINC has participated actively in the development of the U.S. proposals in virtually all past World Administrative Radio Conferences of the International Telecommunication Union (ITU) that have been competent to consider matters of concern to aviation and has participated on the U.S. delegation to these conferences. ARINC will continue to participate in the development of U.S. submissions to the new World Radiocommunications Conferences (WRC).

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ARINC and the air transport industry is concerned with several topics that the ITU Council has proposed be considered at the 1993 WRC. These topics are: a review of the ITU Radio Regulations based upon the report of the Voluntary Group of Experts (VGE), the use of frequency bands allocated to the mobile-satellite service, and actions on certain other Recommendations and Resolutions from past Conferences related to future ITU WRCs. In addition, ARINC would propose that the Commission establish an institutional framework to ensure public participation in the development of proposals to this and future conferences.

DISCUSSION

made in the Radio Regulations, they should be made in the context of a larger, competent World Radiocommunication Conference.

**Mobile Satellite Services.**

The second topic proposed by the Council deals with "facilitating the use of frequency bands allocated to the mobile-satellite service." In particular, the bands 1492-1525, 1525-1559, 1610-1660.5, 1675-1710, 1930-2010, 2120-2200, 2483.5-2520, and 2670-2690 MHz have been allocated to the mobile satellite services, including the aeronautical, maritime, land mobile, and radiodetermination satellite services. ARINC and aviation urges the Commission not to raise its desire for a generic mobile satellite service, at least in the bands 1530-1559 and 1626.5-1660.5 MHz. The United States has proposed this to the last two World Administrative Radio Conferences and has met stiff international opposition. International opposition is based, in substantial part, with a concern for demonstrated protection of safety of life services such as the aeronautical mobile satellite (R) service. The United States generic mobile satellite system operating in this band has not yet been launched. and has not

proven that it can yield to safety communications on other systems.

ARINC currently provides the world's aviation community with its GLOBALink service, utilizing INMARSAT capacity procured through INMARSAT signatories including the Communications Satellite Corporation. This system is now certified by the Federal Aviation Administration for waypoint position reports, and ARINC anticipates its use for two way air traffic control data communications in the future. Reliance upon ARINC's system, grows daily and this service is the centerpiece for any improvement in oceanic air space automation. The Commission should not undermine the international confidence in GLOBALink by challenging the allocation once more.

ARINC recommends that the United States focuses its efforts on harmonization of the new mobile satellite allocations between 1675 MHz and 2690 MHz resulting from the 1992 WARC. These new bands offer an opportunity to the Commission to test its hypotheses relative to generic satellite services without threatening operating safety systems. Raising the generic issue as to the aeronautical L-band satellite allocations so soon after 1992 WARC would prove to be counterproductive to the United States' overall efforts.

**Specific Resolutions and Recommendations.**

There are also a number of Recommendations and Resolutions affecting aviation that might be considered at future ITU radio communications conferences.

**Resolution 208 (Mob-87) Extension of the Frequency Bands Allocated to the Mobile-Satellite and Mobile Services and Their Conditions of Use.** This Resolution should be suppressed because of the actions taken at the 1992 WARC.

**Resolution 408 (Mob-87) Use of the Band 136-137 MHz by Services Other Than Aeronautical Mobile (R) Service.** The United States should propose that this Resolution be added to the agenda for the 1995 or 1997 WARC, with the goal of deleting all secondary services from this aeronautical safety

**Service.** No action should be taken on this Recommendation at this time because the matter is still under study.

**Recommendation 714 (Mob-87) -- Compatibility Between the Aeronautical Mobile (R) Service in the Bands 117.975-137 MHz and Sound Broadcasting Stations in the Band 87.5-108 MHz.** No action should be taken on this Recommendation at this time because the studies are still ongoing.

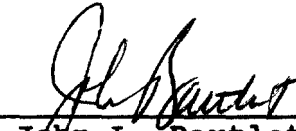
could assist the Commission in developing the U.S. positions. The establishment of a permanent working group would avoid the loss of time involved in recreating the group for each conference.

ARINC would welcome the opportunity to participate representing the interests of aviation on such a committee and will participate actively in the development of the U.S. position to the 1993 World Radio Communications Conference.

Respectfully submitted,

ARINC INCORPORATED

By: \_\_\_\_\_

  
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